

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|  |   |              |
|--|---|--------------|
| DEBORAH LAUFER,                            | ) |              |
|  | ) |              |
| Plaintiff,                                 | ) |              |
|  | ) |              |
| v.   | ) |              |
|  | ) | 2:20-cv-1188 |
| TRIBHUVAN REAL ESTATE L.P.,                | ) |              |
|  | ) |              |
| Defendant,                                 | ) |              |
|  | ) |              |
| HOTELS AND STUFF INC.,                     | ) |              |
|  | ) |              |
| Movant-Interested Party and Amicus Curiae, | ) |              |

**MOTION FOR LEAVE TO FILE A BRIEF *AMICUS CURIAE* IN OPPOSITION TO MOTION  
FOR DEFAULT JUDGMENT**

Hotels and Stuff Inc., by and through its undersigned counsel, moves this Court for leave to file a brief *Amicus Curiae* in Opposition to the Motion for Default Judgment. Hotels and Stuff Inc. is the owner of land in North Huntingdon, Pennsylvania, which is leased to Hiland Terrace Corp., an operator of a tiny ten room motel in North Huntingdon, Pennsylvania. Hotels and Stuff has been sued in an identical lawsuit. It maintains an interest in this litigation for two reasons: First, consistent factual and legal findings must be achieved in these cases. Second, Plaintiff routinely cites decisions in default cases, where nobody challenged the various assertions, to bolster their claims to attorney fees which may affect Hotels and Stuff.

Respectfully submitted,

/s/ J. Allen Roth, Esq. \_\_\_\_\_  
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COUNSEL FOR HOTELS AND STUFF INC.

**CERTIFICATE OF SERVICE**

I, J. Allen Roth, certify that all appearing counsel are members of this Court's ECF system and will receive electronic notice upon filing of this document. In addition, on October 25, 2020, I mailed a true copy of the foregoing to:

TRIBHUVAN REAL ESTATE LP  
c/o Bharat B Patel  
1001 Rowena Dr.  
Ebensburg PA 15931

/s/ J. Allen Roth

J. Allen Roth Esq.